



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 3, 1998

Karen Hastie Williams, Treasurer
Crowell & Moring PAC
1001 Pennsylvania Avenue, NW
Washington, DC 20004

RE: MUR 4844

Dear Ms. Williams:

On October 28, 1998, the Federal Election Commission found that there is reason to believe the Crowell & Moring PAC ("Committee") and you, as treasurer, violated 2 U.S.C. § 434 (a) (4) (A) (i), a provision of the *Federal Election Campaign Act of 1971*, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation, and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

Karen Hastie Williams, Treasurer
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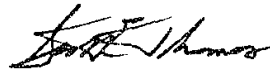
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Mark Shonkwiler, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,



Scott E. Thomas
Acting Chairman

Enclosures

Factual and Legal Analysis

Procedures

Designation of Counsel Form

Conciliation Agreement

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Crowell & Moring PAC
and Karen Hastie Williams, as treasurer

MUR: 4844

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2). The Federal Election Campaign Act of 1971, as amended ("the Act") requires treasurers of political committees, other than authorized committees of a candidate, to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(1). Such committees may choose to file reports either on a monthly or a quarterly basis. 2 U.S.C. § 434(a)(4).

In any calendar year in which a regularly scheduled general election is held, committees that choose to file on a quarterly basis shall file quarterly reports no later than the 15th day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i).

The Crowell & Moring PAC and Karen Hastie Williams, as treasurer, is a political committee not authorized by any candidate, and has elected to file disclosure reports on a quarterly basis.

Pursuant to 2 U.S.C. 434(a)(4)(A)(i), the due date for the Crowell & Moring PAC's 1998 April Quarterly Report was April 15, 1998. The Commission notified the Crowell & Moring PAC on December 29, 1997 and March 20, 1998 that their 1998 April Quarterly Report was due on April 15, 1998. On May 7, 1998, the Commission sent the Committee a non-filer notice

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instructing them to file the report immediately, and that the Commission may initiate an audit or legal enforcement action. On July 15, 1998, the Committee filed their 1998 April Quarterly Report, 91 days late, disclosing receipts totaling \$7,800 and disbursements totaling \$6,250.

Therefore, there is reason to believe that the Crowell & Moring PAC and Karen Hastie Williams, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).

98-04-391-0191